

Exhibit A

REQUEST NO. 1

MULTIPLE CONSPIRACIES

In considering evidence of a conspiracy, whether there existed a single unlawful agreement, or many such agreements, or indeed, no agreement at all, is a question of fact for you, the jury to determine in accordance with the instructions I give you.

When two or more people join together to further one common unlawful design or purpose, a single conspiracy exists. By way of contrast, multiple conspiracies exist when there are separate unlawful agreements to achieve distinct purposes. You may find that there was a single conspiracy despite the fact that there were changes in either personnel, or activities, or both. The fact that the members of a conspiracy may change does not necessarily imply that separate conspiracies exist. A single conspiracy is not transposed into multiple conspiracies simply by a lapse of time, changes in membership, or a shift in the locale of operations. On the other hand, if you find that a conspiracy charged in the Indictment did not exist, you cannot find any defendant guilty of that conspiracy.

Therefore, what you must do is determine whether the conspiracies charged in the Indictment that you are considering existed. If it did, you then must determine the nature of those conspiracies and who were the members.

Authority

Adapted from the Jury Charge of the Hon. Pamela K. Chen in United States v. Hilliard, No. 19-CR-358, and in United States v. Juan Angel Napout, No. 15-CR-252, and the Jury Charge of the Hon. Raymond J. Dearie in United States v. Abid Naseer, No. 10-CR-19 (hereafter “Naseer”); see also Sand § 19.01, Instruction 19-5.